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*Attorneys for Movant Sebastian Murdock*

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
(Charlottesville Division)**

BRENNAN M. GILMORE,

Plaintiff,

v.

ALEXANDER (“ALEX”) E. JONES;  
INFOWARS, LLC, a Texas Limited Liability  
Company; FREE SPEECH SYSTEMS, LLC,  
a Texas Limited Liability Company; LEE  
STRANAHAN; LEE ANN MCADOO  
A/K/A LEE ANN FLEISSNER; SCOTT  
CREIGHTON; JAMES (“JIM”) HOFT;  
ALLEN B. WEST; and DERRICK  
WILBURN,

Defendants.

Civil Action No.: 3:18-cv-00017

**NOTICE OF MOTION BY REPORTER SEBASTIAN MURDOCK TO QUASH  
SUBPOENA FOR HIS PHONE RECORDS**

**PLEASE TAKE NOTICE** that movant reporter Sebastian Murdock, by his undersigned

attorneys, upon the accompany Memorandum of Law and Declaration of Matthew Topic, Esq. (“Topic Decl.”), respectfully moves this Court, at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07102, for an Order, pursuant to Fed. R. Civ. P. 45, quashing a subpoena that defendant, James (“Jim”) Hoft (“Defendant”), issued to non-party Verizon at 180 Washington Valley Road, Bedminster, New Jersey 07921, seeking the phone records of Mr. Murdock.

**PLEASE TAKE FURTHER NOTICE** that Mr. Murdock was made aware of the subpoena for the first time on June 15, 2021, and first received a copy on June 16, 2021. Thus, this motion has been timely filed. Verizon has not yet produced documents and has indicated that it will not do so until this motion is resolved.

**PLEASE TAKE FURTHER NOTICE** that pursuant to L.R. 37.1, Mr. Murdock’s counsel conferred with counsel for Defendant, but they were unable to resolve the dispute presented in this motion. In support of Mr. Murdock’s motion, attached hereto is a supporting Memorandum of Law and the Declaration of Matthew Topic, Esq.

**PLEASE TAKE FURTHER NOTICE** that Mr. Murdock requests oral argument if this motion is opposed.

Date: June 28, 2021

Respectfully submitted,

/s/ Nancy A. Del Pizzo

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